

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding Flexible Use in Mid-Band)	GN Docket No. 17-183
Spectrum Between 3.7 and 24 GHz)	
)	

REQUEST FOR EXTENSION OF REPLY COMMENT DEADLINE

Pursuant to Section 1.46 of the Commission’s rules, 47 C.F.R. § 1.46, the parties listed below respectfully request a 14-day extension of time, until November 15, 2017, to submit reply comments in the above-captioned proceeding.^{1/} Grant of the extension request will permit the development of a more complete record in this proceeding, which will allow the Commission to have a better basis on which to consider how to proceed with proposing rules that will make critical mid-band spectrum available for terrestrial wireless use.

In the *NOI*, the Commission sought input on opening mid-band spectrum to fixed and mobile wireless broadband operations.^{2/} While it asked for comments on spectrum throughout a large range it focused on three spectrum bands: the 3.7-4.2 GHz band, the 5.925-6.425 GHz band, and the 6.425-7.125 GHz band.^{3/} These bands host different incumbent operations and may be subject to different rules in the future, depending on how the Commission chooses to allocate them to new licensed and unlicensed uses.^{4/}

^{1/} *In the Matter of Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Inquiry, GN Docket No. 17-183 (rel. Aug. 3, 2017) (the “*NOI*”).

^{2/} *NOI* at ¶ 1.

^{3/} *Id.* at ¶ 2.

^{4/} *Id.* at ¶ 30.

Many parties submitted comments in response to the *NOI*: seventy-seven in total, across a range of industries, with a wide variety of perspectives on the issues presented.^{5/} Many commenters provided extensive and detailed technical and engineering information as part of their comments.^{6/} The parties seeking an extension of time to submit reply comments recognize that the Commission does not routinely grant such requests and the fact that there is a large number of initial comments should not automatically result in an extension of time. Moreover, many parties, including certain of those submitting this request, highlighted the need for quick Commission action to provide urgently needed spectrum to meet skyrocketing demand.^{7/} They certainly have no interest in delaying the Commission's consideration of the important issues presented in the *NOI*.

Nevertheless, several reasons support Commission grant of a minimal extension of time in this case. *First*, as noted above, the record includes often lengthy and technical analyses of the current use of the target bands.^{8/} In order to develop a complete record, the public interest supports allowing parties a meaningful opportunity to review and respond to those analyses. The current thirty day reply comment period simply does not permit that type of consideration, particularly by the membership-based organizations noted below, where coordination among members is both required and productive.

Second, the further development of the record will *speed*, not delay, the Commission's decision-making in this proceeding and related proceedings. By allowing interested parties

^{5/} See, GN Docket No. 17-183.

^{6/} See, e.g., *Comments of the Satellite Industry Association*, GN Docket No. 17-183 (filed Oct. 2, 2017); *Comments of the Fixed Wireless Communications Coalition*, GN Docket No. 17-183 (filed Oct. 2, 2017); *Comments of Decawave*, GN Docket No. 17-183 (filed Oct. 2, 2017); *Comments of CenturyLink*, GN Docket No. 17-183 (filed Oct. 2, 2017); *Comments of Utilities Technology Council & Edison Electric Institute*, GN Docket No. 17-183 (filed Oct. 2, 2017).

^{7/} See, e.g., *Comments of Wi-Fi Alliance*, GN Docket No. 17-183 (filed Oct. 2, 2017).

^{8/} See, *supra*, n. 6.

additional time to fully address issues such as interference mitigation, incumbent protections, relocation and other issues raised and extensively discussed in comments, the Commission will be in a substantially more informed position to decide how to best proceed. And, by proposing processes and rules that have been developed through a more complete record, the Commission will be in a better position to consider adopting rules that will meet the Commission's goal of making mid-band spectrum available for fixed and mobile wireless use.

Accordingly, the parties listed below urge the Commission to extend the deadline for the submission of reply comments in this proceeding, for a brief 14 day period, until November 15, 2017.

Respectfully submitted,

/s/

Edgar Figueroa
President and CEO

WI-FI ALLIANCE
10900-B Stonelake Blvd.
Suite 126
Austin, TX 78759
(512) 498-9434
efigueroa@wi-fi.org

/s/

Dileep Srihari
Director, Legislative &
Government Affairs

Telecommunications Industry
Association
1320 North Courthouse Road,
Suite 200
Arlington VA 22201
(703)-907-7700

/s/

Kalpak Gude
President

Dynamic Spectrum Alliance
3855 SW 153rd Dr.
Beaverton, OR 97003

/s/

Stephen E. Coran

Lerman Senter PLLC
2001 L Street, N.W., Suite 400
Washington, D.C. 20036
(202) 416-6744
scoran@lermansenter.com
Counsel to the Wireless Internet
Service Providers Association

October 10, 2017